

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

**LOUIS KWAME FOSU,**  
**Plaintiff,**

**V.**

**THE UNIVERSITY OF RHODE ISLAND,  
UNIVERSITY OF RHODE ISLAND  
BOARD OF TRUSTEES, DAVID M.  
DOOLEY, PRESIDENT, THE  
UNIVERSITY OF RHODE ISLAND,  
DONALD DEHAYES, PROVOST AND  
VICE PRESIDENT FOR ACADEMIC  
AFFAIRS, AND JEANNETTE E. RILEY,  
DEAN, COLLEGE OF ARTS &  
SCIENCES, in their individual and official  
capacities,**

**Defendants.**

**C.A. No. 21-cv-279-JJM-PAS**

**DEFENDANTS' MOTION TO DISMISS  
COUNTS II-VII OF PLAINTIFF'S COMPLAINT**

Defendants, the University of Rhode Island ("URI"); University of Rhode Island Board of Trustees; David M. Dooley, URI's former President; Donald DeHayes, Provost and Vice President for Academic Affairs; and Jeannette Riley, Dean of the College of Arts & Sciences (collectively "URI Defendants"), move to dismiss counts ii-vii of Plaintiff's complaint.

The URI Defendants have concurrently filed (1) their supporting memorandum of law and (2) the declaration of Steven M. Richard, Esq. authenticating the exhibits attached thereto.

Under Local Rule Cv. 7(c), the URI Defendants request oral argument on their motion to dismiss and estimate that the hearing will require approximately sixty minutes.

Defendants,

By Their Attorney,

/s/ Steven M. Richard  
Steven M. Richard (#4403)  
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Dated: August 16, 2021

**CERTIFICATE OF SERVICE**

I certify that, on the 16th day of August, 2021, this motion to dismiss was filed and served upon counsel of record via the Court's CM/ECF system.

/s/ Steven M. Richard